



February 16, 2006

Docket Management Facility
US Department of Transportation
400 Seventh Street, SW
Nassif Building, Room PL-401
Washington, DC 20590

Subject: Docket No. 2006-23633; Directorate Identifier 2005-NM-242-AD
Airbus Aircraft Equipped With Certain Sogerma-Services Powered Seats

Dear Ladies / Gentlemen:

The referenced proposed rule advised of and requested comments that will require an inspection to determine if a certain actuator is installed in the pilot's or co-pilot's seat, and doing all the applicable corrective actions if necessary. For certain actuators, the proposed AD would also require replacing rotors on both vertical and horizontal movements with new rotors, and replacing the clutch cap with a new cap. We concur with the contents of the proposed rule and offer the following three comments.

1) Paragraph (h) of the proposed rule states, "After the effective date of this AD, no actuator identified in table 2 of this AD may be installed on any airplane." However, the Sogerma-Services Service Bulletin TAAI1-25-617, dated February 1, 2005, paragraph D(2) states, "The affected pilot and co-pilot seats equipped with MESSIER BUGATTI (LABINAL) will require actuator replacement and the seats equipped with AVIAC or ARTUS actuators require the amendment update on the seat amendment label only. No actuator replacement is required." United Airlines requests that paragraph (h) of the proposed rule be clarified so that the AVIAC or ARTUS actuators can be installed provided that the seat amendment label is installed and suggests the following statement.

"(h) After the effective date of this AD, no actuator identified in table 2 of this AD may be installed on the airplane except the installation of Aviac actuator P/N 6147-6 and Artus actuator P/N AD8552502-1 on seats that have Sogerma-Services Service Bulletin TAAI1-25-617, dated February 1, 2005, paragraph D(2) accomplished."

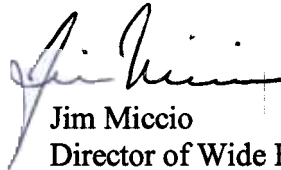
2) The proposed rule requires compliance action in accordance with paragraph A, pages 2 & 3 of the Sogerma-Services Service Bulletin TAAI1-25-617, dated February 1, 2005, to identify the actuator installed on the seats. United Airlines believes that the MESSIER BUGATTI (LABINAL) actuator cannot be identified by just checking for the label on the seat at the location specified in the service bulletin. The actuator may have been replaced with other affected part numbers many times since the seat was originally delivered, and

the actuator identification label might not be on the seat. The NOTE in Sogerma-Services Service Bulletin TAAI1-25-617, dated February 1, 2005, paragraph A, page 3 states, "Seats equipped with ARTUS actuators, have no actuator identification label." United Airlines suggests the following procedure be added to the service bulletin paragraph A, page 3 to accurately identify which actuator is installed on each seat.

"In order to accurately identify the actuator installed in the seat, open the seat back shroud to view the identification nameplate on the actuator."

3) United Airlines has approximately 41 actuators in spare seats that need to be rotated through the shop for AD compliance rework prior to the AD effective date in order to comply with paragraph (h) of the proposed rule. The actuator supplier, MESSIER BUGATTI (LABINAL), has a limited quantity of spare actuators. We estimate that we would require a 6-month window between the AD release date and the AD effective date to permit sufficient time to rotate our spares through the shop for AD rework. Our North American counterparts are expected to be in the same situation as most of them utilize the same actuator supplier. We request that the FAA select an AD effective date, at least, 6 to 8 months after the AD release date to provide sufficient lead time for the industry to rotate the spare actuators and seats.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jim Miccio", is written over a horizontal line.

Jim Miccio
Director of Wide Body Engineering

cc: Richard Atkinson, United Airlines – SFOEG
David Hui, United Airlines – SFOEG
Dave Pappy, United Airlines – INDEG
Clay Satterlee, United Airlines – SFOEG
Ping Wang, United Airlines – SFOEG